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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. 4:22-CR-00104-YGR
)	
Plaintiff,)	STIPULATION TO CONTINUE STATUS
)	CONFERENCE AND TO EXCLUDE TIME FROM
v.)	MAY 11, 2022 TO JUNE 15, 2022 AND
)	[PROPOSED] ORDER
ENRIQUE CHAVEZ,)	
)	
Defendant.)	

This matter is currently set for a status conference on May 11, 2022. To provide adequate time for the defense to review discovery already produced, for the government to obtain and produce additional discovery, and for the parties to engage in discussions regarding a potential resolution of this case, the parties hereby request that the status conference be continued to June 15, 2022.

The parties stipulate and agree that excluding time until June 15, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from May 11, 2022 through June 15, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that he has obtained approval from Stip. to Continue Status Conference and Exclude Time and ~~[Proposed]~~ Order
Case No. CR 22-104-YGR

counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: May 4, 2022

/s/ Andrew Paulson
ANDREW PAULSON
Assistant United States Attorney

DATED: May 4, 2022

/s/ Steven Kalar
STEVEN KALAR
Counsel for Defendant Enrique Chavez

~~[PROPOSED]~~ ORDER

The Court hereby continues the status conference in this matter to June 15, 2022 at 2:00 p.m. Additionally, based upon the facts set forth in the stipulation of the parties and the representations made to the Court, and for good cause shown, the Court finds that failing to exclude the time from May 11, 2022 through June 15, 2022 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from May 11, 2022 through June 15, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from May 11, 2022 through June 15, 2022 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: 5/4/2022


HONORABLE YVONNE GONZALEZ ROGERS
United States District Judge